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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 JOHN BURNETT,
20 Defendant.

21 Case No. 2:21-mj-00777-VCF

22 **STIPULATION TO CONTINUE
23 PRELIMINARY HEARING**
24 (First Request)

25 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
26 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
for the United States of America, and Rene L. Valladares, Federal Public Defender, and
LaRonda R. Martin, Assistant Federal Public Defender, counsel for John Burnett, that the
Preliminary Hearing currently scheduled on October 18, 2021, be vacated and continued to a
date and time convenient to the Court, but no sooner than forty-five (45) days.

27 The Stipulation is entered into for the following reasons:

28 1. Counsel for the defendant needs additional time to review the preliminary
29 discovery, forthcoming from the government, with Mr. Burnett. The parties are attempting to
30 negotiate the matter pre-indictment. Counsel for the defendant also needs additional time to
31 determine whether there are any pretrial issues that must be litigated, determine whether the

1 case will ultimately go to trial and/or determine whether the matter can be resolved through
2 negotiations pre-indictment.

3 2. The defendant is not incarcerated and does not object to the continuance.

4 3. The parties agree to the continuance.

5 4. The additional time requested by this stipulation is excludable in computing the
6 time within which the defendant must be indicted and the trial herein must commence pursuant
7 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
8 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

9 This is the first stipulation to continue filed herein.

10 DATED this 8th day of October, 2021.

11 RENE L. VALLADARES
12 Federal Public Defender

13 /s/ *LaRonda R. Martin*
14 By _____

15 LARONDA R. MARTIN
16 Assistant Federal Public Defender

17 CHRISTOPHER CHIOU
18 Acting United States Attorney

19 /s/ *Bianca R. Pucci*
20 By _____

21 BIANCA R. PUCCI
22 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JOHN BURNETT,
Defendant.

Case No. 2:21-mj-00777-VCF

ORDER

JOHN BURNETT,

Defendant.

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for Monday, October 18, 2021 at 4:00 pm, be vacated and continued to November 29, 2021 at the hour of 4:00 p.m.; or to a time and date convenient to the court.

DATED this 8th day of October, 2021.

Carl Gaddis

UNITED STATES MAGISTRATE JUDGE